

UNITED STATES DISTRICT COURT
THE NORTHERN DISTRICT OF IOWA

SONJA DUNLAP,)	
)	
Plaintiff,)	
)	CASE NO. 1:11-cv-117
v.)	
)	
TERRY LOCKRIDGE and DUNN, INC.,)	NOTICE OF REMOVAL
TERRY LOCKRIDGE & DUNN, INC., and)	
TER LOCK DUN, LTD,)	
)	
Defendants.)	

Defendant Terry, Lockridge and Dunn, Inc. ("TLD") (improperly named Terry Lockridge & Dunn, Inc. and Ter Lock Dun, LTD), pursuant to 28 U.S.C. § 1441, *et seq.*, for removal of cause of action from the Iowa District Court for Linn County to the United States District Court for the Northern District of Iowa, respectfully states:

1. TLD is the properly named defendant in a civil action commenced October 13, 2011, in the Iowa District Court for Linn County, entitled "Sonja Dunlap v. Terry Lockridge and Dunn, Inc., Terry Lockridge & Dunn, Inc., and Ter Lock Dun, Ltd." (the "state court action"). That action is docketed as No. LACV073892.

2. Defendant was served with the Original Notice and the Petition at Law on October 20, 2011 by service upon its registered agent for service of process. Copies of the Original Notice, the Petition at Law and Jury Demand are attached hereto and constitute all process, pleadings and orders served upon Defendant in that cause of action.

3. In the state court action, as set forth in the Petition at Law, Plaintiff Sonja Dunlap seeks to recover from Defendant as a result of alleged violations of the Americans with Disabilities Act, 42 U.S.C. § 12101, *et seq.*, and the Iowa Civil Rights Act.

4. This Court has original jurisdiction over the claims alleged here. Count I of the Petition at Law alleges violations of the Americans with Disabilities Act and the Iowa Civil Rights Act. This Court possess original jurisdiction over such claims pursuant to 28 U.S.C. § 1331. Such claims may be removed to this Court pursuant to the provisions of 28 U.S.C. § 1441(b).

5. Venue for removal to this Court is proper pursuant to the provisions of 28 U.S.C. § 1391(a).

6. To the extent Plaintiff's action asserts any state law claims, the Court has supplemental jurisdiction pursuant to 28 U.S.C. § 1367.

WHEREFORE, Defendant hereby removes the state court action pending as No. LACV073892 in the Iowa District Court for Linn County to this Honorable Court.

/s/Mark P.A. Hudson
MARK P.A. HUDSON AT0003691
for
SHUTTLEWORTH & INGERSOLL, P.C.
115 Third Street SE, 500 U.S. Bank Bldg.
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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that he caused copies of the foregoing Notice of Removal to be served on counsel of record through the Court's Electronic Case Filing/Case Management ("ECF/CM") system this 3rd day of November, 2011, addressed to:

Matt Reilly
Eells & Tronvold Law Offices, PLC
1921 51st Street NE
Cedar Rapids, IA 52404
Matt@eels-tronvold.com

Service via regular mail to:

Linn County Clerk of Court
Linn County Courthouse
P.O. Box 1468
Cedar Rapids, IA 52406-1468

/s/Mark P.A. Hudson _____